

DATA PROTECTION POLICY

The Club is required under the terms of the Data Protection Act 29/2021 to maintain a data protection policy that covers all the personal data that may be obtained by the Club about members and which also protects members from each other when data is obtained “informally” (which includes photographs and sound recordings taken by members on their mobile phones when participating in any Club activity).

The Club obtains and maintains as little personal data about members as possible. The Membership Secretary will maintain a Membership List containing such personal data as is necessary to carry out the legitimate interests of the Club, subject to the requirements of Llei 29/2021, del 28 d'octubre 2021, qualificada de protecció de dades personals (or its successor). Access to this data shall be strictly controlled and shall not be provided to third party commercial enterprises except for payment processing.

The Club maintains a mailing list which contains only the names (as given by members) and emails to be used by the Club in sending out information to members. This mailing list is maintained by the Membership Secretary and a second designated member of the Board and, although mailings may be prepared by other designated members, they do not have access to the underlying personal data of individual members. The mailing list is registered with the data protection authorities.

Activity Groups may maintain lists of members who have indicated interest in participating in the activity. In all cases these lists are limited to names (as given by members) and contact links (which may be e mail addresses or mobile phone numbers, depending on whether the lists are maintained on spreadsheets or as WhatsApp or Telegram or other social media groups for the activity). If maintained as spreadsheets, they are kept by the activity group leader and only contain data on members who have requested to be kept informed of activities; if maintained on social media groups then the member has direct control over whether they continue to form part of the group. Members leaving the Club have the responsibility for ensuring that they remove themselves from social media groups and to inform group leaders that they no longer wish to receive notifications of group activities.

The Club Secretary is our Delegate for Data Protection and responsible for any contacts with the Data Protection Authority and for dealing with any matters raised by members regarding our policies or their implementation.